

26 March 2012

To: Tim Maguire  
Mobility Division, Wireless Telecommunications Bureau  
Federal Communications Commission

Dear Mr. Maguire

**FCC WT Docket No. 12-6  
REPLY TO WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON  
REQUEST FOR  
WAIVER BY MOBILARM LIMITED TO ALLOW CERTIFICATION AND USE OF  
EMERGENCY TRANSMITTER BEACON FOR SUBMARINERS**

I write with reference to the comments left on the aforementioned waiver request. The comments specifically address the use of a distress message over channel 16. This feature is software controlled. Whilst there are countries that favour the use of voice in their rescue operations, we can configure the US Navy units to omit the voice distress signal, thus addressing the concerns of the two submissions. The eventuality of a submarine escape is a serious event and we have provided a solution that provides all potential avenues for rescue. Reducing the effectiveness of the product by one function is not something we take lightly when lives are at stake, but the functionality available through its DSC, AIS and 121.5 MHz transmissions still allow for the best option for survival.

The product is designed for the sole purpose of saving lives. Both of the replies to the waiver have not provided any factual basis or data to corroborate their opinions however we understand the objection to voice which is why we will switch it off to address that concern. We do therefore request your approval to allow the US Navy to provide the safety equipment necessary for them to properly protect the nation's military personnel.

Sincerely,

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**Ken Gaunt**  
Chief Executive Officer

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